

EXHIBIT 2

Chart of Claim Elements Not Plausibly Alleged in Plaintiffs' Amended Complaint

Claim	Elements Not Plausibly Alleged
Third Claim for Relief: Unlawful Tying Arrangement Concerning the Use of Large Amphitheaters and Artist Promotions Markets in Violation of Sherman Act § 1	<ol style="list-style-type: none"> <li data-bbox="894 312 1481 572">The well-pleaded facts underlying Plaintiffs' tying claim do not describe tying, but rather a lawful refusal to deal with rival promoters who seek to rent amphitheaters from Live Nation so that they may include those venues in their artist-clients' tours. <li data-bbox="894 593 1481 1015">Plaintiffs fail to allege that there are consumers—artists—who <i>themselves</i> (a) wish to acquire the tying product (amphitheater access) directly from Live Nation and the tied product (other promotional services) from another promoter, (b) seek to enter into contracts with Live Nation for the amphitheater access alone, and (c) are presented with terms obligating the purchase of the tied product.
<p>State Plaintiffs' Claims for Damages Pursuant to 15 U.S.C. § 15c, for the following alleged violations:</p> <ul style="list-style-type: none"> <li data-bbox="208 1136 812 1248">First Claim for Relief: Monopolization of Primary Ticketing Services Markets in Violation of Sherman Act § 2 <li data-bbox="208 1269 812 1381">Second Claim for Relief: Unlawful Exclusive Dealing in Violation of Sherman Act § 1 <li data-bbox="208 1402 812 1543">Third Claim for Relief: Unlawful Tying Arrangement Concerning the Use of Large Amphitheaters and Artist Promotions Markets in Violation of Sherman Act § 1 <li data-bbox="208 1564 812 1727">Fourth Claim for Relief: Monopolization of the Market for the Use of Large Amphitheaters in Violation of Sherman Act § 2 <li data-bbox="208 1748 812 1839">Fifth Claim for Relief: Monopolization of the Markets for Concert Promotion Services in Violation of Sherman Act § 2 	<ol style="list-style-type: none"> <li data-bbox="894 1058 1465 1148">State Plaintiffs fail to allege that the consumers on whose behalf they sue suffered an “antitrust injury.” <li data-bbox="894 1170 1481 1311">State Plaintiffs fail to allege that the consumers on whose behalf they sue are “efficient enforcers” of the antitrust laws.